

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IARNACH TECHNOLOGIES LTD.,

Plaintiff and Counterclaim
Defendant,

v.

AT&T CORP., AT&T VENTURES, LLC,
AT&T MOBILITY LLC, AT&T MOBILITY
II LLC, and AT&T SERVICES INC.,

Defendants and Counterclaim
Plaintiffs,

and

NOKIA OF AMERICA CORPORATION,

Intervenor and Counterclaim
Plaintiff,

v.

ATLANTIC IP SERVICES LIMITED,

Counterclaim Defendant.

Case No. 2:23-cv-00231-JRG

JURY TRIAL DEMANDED

REQUEST FOR CLERK ENTRY OF DEFAULT

Pursuant to the Federal Rule of Civil Procedure 55(a), Defendants AT&T Corp., AT&T Communications LLC, AT&T Mobility LLC, AT&T Mobility II LLC, and AT&T Services Inc. (“AT&T”) and Intervenor Nokia of America Corporation (“Nokia”) (collectively, “Counterclaim Plaintiffs”), hereby request an entry of default by the clerk against Atlantic IP Services Limited (“Counterclaim Defendant”) for failing to serve an answer or other responsive pleading to AT&T’s First Amended Answer and Counterclaims (Dkt. 95) and Nokia’s Second Amended Answer and

Counterclaims (Dkt. 96). Attached is an affidavit in support of the clerk's entry for default. *See* Exhibit 1.

Dated: August 20, 2024

Respectfully submitted,

/s/ M. Scott Stevens

M. Scott Stevens
Stephen R. Lareau
Karlee N. Wroblewski
Matthew M. Welch
ALSTON & BIRD LLP
Vantage South End
1120 S. Tryon Street, Suite 300
Charlotte, NC 28203
Telephone: (704) 444-1000
Facsimile: (704) 444-1111
scott.stevens@alston.com
stephen.lareau@alston.com
karlee.wroblewski@alston.com
matt.welch@alston.com

John D. Haynes
David S. Frist
Matthew W. Howell
James H. Atkison
ALSTON & BIRD LLP
One Atlantic Center
1201 W Peachtree St. NE #4900
Atlanta, GA 30309
Telephone: (404) 881-7000
Facsimile: (404) 881-7777
john.haynes@alston.com
david.frist@alston.com
matthew.howell@alston.com
james.atkison@alston.com

Theodore Stevenson, III
ALSTON & BIRD LLP
2200 Ross Avenue, Suite 2300

Dallas, TX 75201
Phone: (214) 922-3400
Fax: (214) 922-3899
ted.stevenson@alston.com

Deron R. Dacus
State Bar No. 00790553
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Telephone: (903) 705-1117
Facsimile: (903) 581-2543
ddacus@dacusfirm.com

*Counsel for Defendants and Intervenor
(Counterclaim-Plaintiffs)
AT&T Ventures, LLC;
AT&T Corp.;
AT&T Mobility II LLC;
AT&T Mobility LLC;
AT&T Services Inc.; and
Nokia of America Corporation*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served electronically on August 20, 2024,
on all counsel who have consented to electronic service.

/s/ M. Scott Stevens

M. Scott Stevens